

# Sevocity

## Application Service Provider Privacy & Security Policies

<b>Access</b>	<p>Although team members of Sevocity may require access to information resources for business purposes, this access must be limited to that which is specifically authorized. Use of resources beyond that which is authorized results in unnecessary risks to electronic information with no corresponding business value.</p> <ol style="list-style-type: none"> <li>1. User access management. Sevocity team leaders shall manage team member's access to the IT resources (e.g., computing systems, software applications, etc.) under their responsibility, so that such access is appropriately authorized, documented, and limited to that which is needed to perform authorized tasks. Because a team member's responsibilities and relationships with Sevocity may change over time, team leaders shall ensure that user access privileges are regularly reviewed and adjusted to comply with currently authorized activities.</li> <li>2. IT resource access controls. Sevocity team leaders shall ensure that IT resources under their responsibility (developed, purchased or otherwise used to handle Sevocity and Sevocity customer information) have adequate features and controls to support the proper management of user access as described in section 1.</li> <li>3. Network security controls. Sevocity team leaders shall ensure that electronic access to and use of the Sevocity data networks under their responsibility is appropriately controlled to protect data network equipment and other networked IT resources. Such controls may include network segmentation, external connection management, secure transmission services, and network traffic restrictions.</li> </ol>
<b>Authorization</b>	<p>Team members of Sevocity may require access to information resources for business purposes, this access must be limited to that which is specifically authorized on a need-to-know basis. Authorization is provided by Sevocity leadership and at no time is access to the data provided without customer authorization/approval.</p>
<b>Authentication</b>	<p>Sevocity team members have Department of Defense background checks completed before being hired. Once on the team the member is provided a user-ID and password in accordance with their need-to-know.</p>
<b>Audit</b>	<p>Sevocity, a division of Conceptual MindWorks, Inc. has contracted with a law firm specializing in HIPAA law. The firm conducts periodic audits of Sevocity for both privacy and security considerations with regard to the evolving HIPAA requirements.</p>
<b>Secondary Uses of Data</b>	<p>The Sevocity data is used by Sevocity customers for clinical purposes. CMI has no rights or intentions for secondary use of the data.</p>

<b>Data Ownership</b>	<p>Per Section 4.03 (d) of the Sevocity Services Agreement, “CMI shall provide to Customer a copy of the Data in an industry standard data format after payment of all amounts owing to CMI”. Standard format, shall include, at the customer’s request, PDF files of patient’s charts.</p> <p>Customer owns all patient data entered and maintained by customer that is contained within Sevocity’s systems. Upon termination of the Sevocity Services Agreement, per Section 4.03, such data will be provided to Customer. Sevocity will verify receipt of data by customer and will then delete customer’s patient data from Sevocity systems as follows:</p> <p>Disposal of electronic equipment and media. Computing and network equipment and storage media shall be purged of all Sevocity and Sevocity customer information or destroyed before disposal or release from Sevocity control to a third party. In the rare event the information is not purged prior to release or the device destroyed prior to disposal, Sevocity shall acquire confirmation from the contracted third party that the information is properly purged. For equipment and media that is to be redeployed within the Sevocity division of Conceptual MindWorks, Inc., Sevocity shall purge all customer information prior to redeployment.</p>
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